

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
: :  
Louis R. Furman, Jr. : No. 19-12154-JKF  
Debtors :

ANSWER TO FORD MOTOR CREDIT COMPANY'S MOTION  
FOR ADEQUATE PROTECTION

Debtor Louis R. Furman, Jr., by his Attorney David M. Offen respectfully submits the following:

The debtor wishes to retain the vehicle and will continue to make regular payments as per the terms.

WHEREFORE, the Debtor respectfully requests that he may retain his vehicle and continue to make regular payments towards it.

Respectfully submitted,

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 5/28/19

CERTIFICATE OF SERVICE

The Standing Chapter 13 Trustee, Scott F. Waterman and Howard Gershman, on behalf of Ford Motor Credit Company, will be served by electronic mail.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 5/28/19